

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MARCEL JOHNSON, NEIL HIRSCH
and JEFFREY L. FRIEDMAN,

Plaintiff,

v.

THE GILLETTE COMPANY,

Defendant.

Civil Action No. 05-11455 DPW

**ASSENTED-TO MOTION TO EXTEND TIME TO MOVE, ANSWER,
OR OTHERWISE RESPOND TO COMPLAINT**

Pursuant to Fed.R.Civ.P. Rule 6(b)(1), Defendant, The Gillette Company (“Gillette”), hereby moves, with assent, that the time for Gillette to move, answer, or otherwise respond to the complaint be extended, to and including 30 days after disposition by the Judicial Panel on Multidistrict Litigation (“JPML”) of a Motion for Transfer and Coordination or Consolidation currently pending before the JPML.

Specifically, Gillette states that this action is one of a number of similar actions filed in this District and elsewhere that are subject to, or identified as potential “tag-along” actions to, a multi-district litigation Motion for Transfer and Coordination or Consolidation (“MDL Motion”) now pending before the JPML under the caption *In re M3Power Razor System Marketing Sales & Practices Litigation*, MDL No. 1704. A hearing on the MDL Motion is scheduled to occur before the JPML on September 29, 2005. As a result, Gillette requests, with assent, that the time to move, answer, or otherwise respond be extended to and including 30 days after the JPML’s decision on the pending MDL Motion.

WHEREFORE, the parties having agreed to the foregoing schedule, Gillette respectfully requests that this assented-to motion be granted.

Respectfully submitted

THE GILLETTE COMPANY
By their attorneys,

/s/ Mark P. Szpak

Harvey J. Wolkoff (BBO #532880)

Mark P. Szpak (BBO #546261)

Emily C. Shanahan (BBO #643456)

Ropes & Gray LLP

One International Place

Boston, Massachusetts 02110-2624

(617) 951-7000

ASSENTED TO:

/s/ Alan L. Kovacs (by MPS)

Alan L. Kovacs (BBO # 278240)

Law Office of Alan L. Kovacs

2001 Beacon Street, Suite 106

Boston, Massachusetts 02135

(617) 964-1177

Date: September 23, 2005